

EXHIBIT B

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (FM) ECF Case
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This document relates to:

Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al., No. 03 Civ. 9849
Federal Insurance Co., et al. v. Al Qaida, et al., No. 03 Civ. 6978
Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al., No. 04 Civ. 1923
Continental Casualty Co., et al. v. Al Qaeda, et al., No. 04 Civ. 5970
Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al., No. 04 Civ. 7065
Euro Brokers Inc., et al., v. Al Baraka, et al., No. 04 Civ. 7279

**PLAINTIFFS' SUPPLEMENTAL REQUESTS
FOR PRODUCTION OF DOCUMENTS TO DUBAI ISLAMIC BANK**

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES
July 31, 2012

**PLAINTIFFS' SUPPLEMENTAL REQUESTS
FOR PRODUCTION OF DOCUMENTS TO DUBAI ISLAMIC BANK**

Plaintiffs in *Kathleen Ashton, et al. v. Al Qaeda Islamic Army, et al.*, Case No. 02 Civ. 6977, *Thomas Burnett, Sr., et al. v. Al Baraka Inv. & Dev. Corp., et al.*, Case No. 03 Civ. 9849, *Federal Insurance Co., et al. v. al Qaida, et al.*, Case No. 03 Civ. 6978, *Estate of John P. O'Neill, Sr., et al. v. Al Baraka., et al.*, Case No. 04 Civ. 1923, *Continental Casualty Co., et al. v. Al Qaeda, et al.*, Case No. 04 Civ. 5970, *Cantor Fitzgerald & Co., et al. v. Akida Bank Private Ltd, et al.*, Case No. 04 Civ. 7065, and *Euro Brokers Inc., et al., v. Al Baraka, et al.*, Case No. 04 Civ. 7279, propound and serve on Dubai Islamic Bank (hereinafter "Defendant" or "DIB") the following Supplemental Requests for Production of Documents to be answered fully and under oath, pursuant to Rule 34 of the Federal Rules of Civil Procedure, within 30 days of their receipt.

The "Instructions" and "Definitions" set forth in the Plaintiffs' First Set of Requests for Production of Documents Directed to Dubai Islamic Bank are incorporated herein by reference.

**PLAINTIFFS' SUPPLEMENTAL REQUESTS
FOR PRODUCTION OF DOCUMENTS TO DUBAI ISLAMIC BANK**

1. Please provide all documents regarding accounts held by and / or foreign transfers by Ali Abdul Aziz Ali (A/K/A Ammar al-Baluchi, Amar al-Balochi, Ali Abd al-Aziz Ali, Isam Mansur, Aliosh, or Ali A.). This includes, but is not limited to, foreign transfers through the UAE Exchange.

ANSWER:

2. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Khalid Sheikh Mohammed ("KSM") (A/K/A Khalid Shaikh Mohammed, Khalid Shaikh Muhammed, Khalid Shaykh Mohammad, Khaled Shaikh Mohammad, Khalid Shaykh Muhammed, Ashraf Refaat Nabith Henin, Khalid Abdul Wadood, Salem Ali, Fahd Bin Abdallah Bin Khalid, Fahd Bin Abdallah Bin Khalid, Abdulrahman A. A. Al Ghamdi, Abdulrahman Abdullah al-Ghamdi, Mukhtar al-Baluchi, Hashim Abdulrahman, Hashim Ahmed, Khalid al-Shaykh al-Ballushi, Al-Mukh, or Mukhtar), any DIB account for any entity in which KSM held any beneficial interest, and / or any DIB account over which KSM had signatory authority or had any actual or potential beneficial interest.

ANSWER:

3. Please provide all documents relating to all other transactions at DIB, financial or otherwise, involving KSM or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 2 above.

ANSWER:

4. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Walid Muhammed Salih Mubarak Bin'Attash ("Walid bin Attash") (A/K/A Khallad Bin Attash, Saleh Saeed Mohammed Bin Yousef, Tawfiq Muhammad Salih Bin Rashid, Walid bin Attash, Walid Muhammed Salih bin Roshayed bin Attash, Tawfiq bin Attash), any DIB account for any entity in which Walid

bin Attash held any beneficial interest, and / or any DIB account over which Walid bin Attash had signatory authority or had any actual or potential beneficial interest.

ANSWER:

5. Please provide all documents relating to all other transactions at DIB, financial or otherwise, involving Walid bin Attash or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 4 above.

ANSWER:

6. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Ramzi Binalshibh (A/K/A Ramzi Bin al-Shibh, Abu Ubaydah, Ahad Abdollahi Sabet, Ramzi bin al-Shaibah), any DIB account for any entity in which Ramzi Binalshibh held any beneficial interest, and / or any DIB account over which Ramzi Binalshibh had signatory authority or had any actual or potential beneficial interest.

ANSWER:

7. Please provide all documents relating to all other transactions at DIB, financial or otherwise, involving Ramzi Binalshibh or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 6 above.

ANSWER:

8. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Muhammed al Kahtani (A/K/A Muhammad al Kahtani, Muhamed al Kahtani, Muhamad al Kahtani, Mohammad al Kahtani, Muhammed Al Katani, Ahmed al Qahtani; Mohamed al Qahtani; Abdul Rahman al Janoobi), any DIB account for any entity in which Muhammed al Kahtani held any beneficial interest, and / or any DIB account over which Muhammed al Kahtani had signatory authority or had any actual or potential beneficial interest.

ANSWER:

9. Please provide all documents relating to all other transactions at DIB, financial or otherwise, involving Muhammed al Kahtani or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 8 above.

ANSWER:

10. Please provide all account documents for the passport numbers listed on the DOD charge sheets of Mustafa Ahmed Adam al Hawsawi (A/K/A Mustafa al-Hawsawi, Mustafa Ahmed, Mustafa Muhammad Ahmad, Ahmed Mustafa, Mustafa Ahmed Al-Hisawi, Hashem Abdulrahman, Hashem Abdollahi, Zaher, or Khal), Ali Abdul Aziz Ali (A/K/A Ammar al-Baluchi, Amar al-Balochi, Ali Abd al-Aziz Ali, Isam Mansur, Aliosh, or Ali A.), Khalid Sheikh Mohammed (“KSM”) (A/K/A Khalid Shaikh Mohammed, Khalid Shaikh Muhammed, Khalid Shaykh Mohammad, Khaled Shaikh Mohammad, Khalid Shaykh Muhammed, Ashraf Refaat Nabith Henin, Khalid Abdul Wadood, Salem Ali, Fahd Bin Abdallah Bin Khalid, Fahd Bin Abdallah Bin Khalid, Abdulrahman A. A. Al Ghamdi, Abdulrahman Abdullah al-Ghamdi, Mukhtar al-Baluchi, Hashim Abdulrahman, Hashim Ahmed, Khalid al-Shaykh al-Ballushi, Al-Mukh, or Mukhtar), Walid Muhammed Salih Mubarak Bin’Attash (“Walid bin Attash”) (A/K/A Khallad Bin Attash, Saleh Saeed Mohammed Bin Yousef, Tawfiq Muhammad Salih Bin Rashid, Walid bin Attash, Walid Muhammed Salih bin Roshayed bin Attash, Tawfiq bin Attash), Ramzi Binalshibh (A/K/A Ramzi Bin al-Shibh, Abu Ubaydah, Ahad Abdollahi Sabet, Ramzi bin al-Shaibah), or Muhammed al Kahtani (A/K/A Muhammad al Kahtani, Muhamed al Kahtani, Muhamad al Kahtani, Mohammad al Kahtani, Muhammed Al Katani, Ahmed al Qahtani; Mohamed al Qahtani; Abdul Rahman al Janoobi).

ANSWER:

11. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Foutanga Dit Babani Sissoko, any DIB account for any entity in which Foutanga Dit Babani Sissoko held any beneficial interest, or any DIB account over which Foutanga Dit Babani Sissoko had signatory authority or had any actual or potential beneficial interest.

ANSWER:

12. Please provide all documents relating to Foutanga Dit Babani Sissoko or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 11.

ANSWER:

13. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Abdou Karim Pouye, any DIB account for any entity in which Abdou Karim Pouye held any beneficial interest, or any DIB account over which Abdou Karim Pouye had signatory authority or had any actual or potential beneficial interest.

ANSWER:

14. Please provide all documents relating to Abdou Karim Pouye or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 13.

ANSWER:

15. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Mamadou Diao, any DIB account for any entity in which Mamadou Diao held any beneficial interest, or any DIB account over which Mamadou Diao had signatory authority or had any actual or potential beneficial interest.

ANSWER:

16. Please provide all documents relating to Mamadou Diao or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 15.

ANSWER:

17. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Sekou Diao, any DIB account for any entity in

which Sekou Diao held any beneficial interest, or any DIB account over which Sekou Diao had signatory authority or had any actual or potential beneficial interest.

ANSWER:

18. Please provide all documents relating to Sekou Diao or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 17.

ANSWER:

19. Please provide all documents relating to all DIB accounts established or held in the name of, on behalf of, and / or for the benefit of Pascal Akoussoulelou Bodjona, any DIB account for any entity in which Pascal Akoussoulelou Bodjona held any beneficial interest, or any DIB account over which Pascal Akoussoulelou Bodjona had signatory authority or had any actual or potential beneficial interest.

ANSWER:

20. Please provide all documents relating to Pascal Akoussoulelou Bodjona or any entity in which he has held any beneficial interest, and which are not responsive to Request No. 19.

ANSWER:

21. Please provide all documents relating to DIB employee Hussein Ibrahim El Refaie in regards to transactions or investigations of transactions involved in *Dubai Islamic Bank v. Citibank, N.A.*, 99 Civ. 1930 (RMB) (S.D.N.Y.).

ANSWER:

22. Please provide all documents relating to DIB employee Mohammad Ayyoub Mohammed Saleh in regards to transactions or investigations of transactions involved in *Dubai Islamic Bank v. Citibank, N.A.*, 99 Civ. 1930 (RMB) (S.D.N.Y.).

ANSWER:

23. Please provide all documents relating to Foutanga Dit Babani Sissoko's purchase and attempted export of two helicopters between 1995 and 1999.

ANSWER:

24. Please provide all documents relating to a January 12, 1999 meeting, attended by representatives of DIB, with a group of prosecutors and U.S. Customs agents in Miami, Florida to discuss the banking transactions and related actions of Foutanga Dit Babani Sissoko as referenced in the Miami New Times on April 8, 1999.

ANSWER:

25. Please provide all documents relating to the grand jury investigation(s) into Foutanga Dit Babani Sissoko's financial activities in the United States as referenced in the Miami New Times on April 8, 1999.

ANSWER:

26. Please provide all documents relating to the UAE's request to the Government of Mali that it arrest and extradite Foutanga Dit Babani Sissoko as referenced in the Miami New Times on April 8, 1999.

ANSWER:

27. Please provide all documents relating to the account of Helene Assa Camara at Banque Multi Commerciale in Geneva, Switzerland frozen in 1998 as referenced in the Miami New Times on April 8, 1999.

ANSWER:

28. Please provide all documents relating to the accounts of Mamadou Diao and Sekou Oumar Diao at Citibank – Geneva in Geneva, Switzerland frozen in 1998 as referenced in the Miami New Times on April 8, 1999.

ANSWER:

29. Please provide all documents relating to DIB's mutual assistance request to law enforcement in Switzerland in 1998 relating to Foutanga Dit Babani Sissoko and his alleged fraud involving DIB's correspondent banking account with Citibank, N.A.

ANSWER:

30. Please provide all documents relating to a civil action filed by DIB in the Isle of Man to block the account of M.K. Musa in 1998 as referenced in the Miami New Times on April 8, 1999.

ANSWER:

31. Please provide all documents relating to a criminal complaint filed in France in 1998 to recover money allegedly stolen from DIB's correspondent banking account with Citibank, N.A. as referenced in the Miami New Times on April 8, 1999.

ANSWER:

32. Please provide all documents relating to a criminal complaint filed in 1998 against Foutanga Dit Babani Sissoko, Abdou Karim Pouye, Oumar Kante, and Helene Assa Camara in Senegal as referenced in the Miami New Times on April 8, 1999.

ANSWER:

33. Please provide all documents not specifically requested in Supplemental Requests 11-32 relating to *Dubai Islamic Bank v. Citibank, N.A.*, 99 Civ. 1930 (RMB) (S.D.N.Y.).

ANSWER:

34. Please provide all documents for individual(s) with Pakistani passport number E911562 from Sept. 1, 1998 through Oct. 1, 2001.

ANSWER:

35. Please provide all documents DIB sent to and / or received from any United States government agency (including without limitation the Department of the Treasury, the Office of Foreign Assets Control ("OFAC"), Department of State, Defense Intelligence

Agency, Federal Bureau of Investigation, Department of Justice, and Central Intelligence Agency) concerning any Freedom of Information Act ("FOIA") request seeking the production of documents referring or relating to DIB. The time period for this request is for the period from January 1998 through the present.

ANSWER:

36. Please provide all documents DIB sent to and / or received from any United States government agency (including without limitation the Department of the Treasury, the Office of Foreign Assets Control ("OFAC"), Department of State, Defense Intelligence Agency, Federal Bureau of Investigation, Department of Justice, and Central Intelligence Agency) concerning any objection by DIB to the production of documents in response to a FOIA request. The time period for this request is for the period from January 1998 through the present.

ANSWER:

37. Please provide all documents DIB sent to and / or received from any United States government agency (including without limitation the Department of the Treasury, the Office of Foreign Assets Control ("OFAC"), Department of State, Defense Intelligence Agency, Federal Bureau of Investigation, Department of Justice, and Central Intelligence Agency) concerning any FOIA request submitted by any of the 03 MDL 1570 plaintiffs or any of their counsel. The time period for this request is for the period from September 2001 through the present.

ANSWER:

38. Please provide all documents DIB sent to and / or received from any United States government agency (including without limitation the Department of the Treasury, the Office of Foreign Assets Control ("OFAC"), Department of State, Defense Intelligence Agency, Federal Bureau of Investigation, Department of Justice, and Central Intelligence Agency). The time period for this request is for the period from January 1998 through the present.

ANSWER:

39. Please provide any and all documents relating to DIB accounts established or held in the name of, on behalf of, and / or for the benefit of the International Islamic Relief Organization (“IIRO”), including, but not limited to, DIB Account No. 5400287. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among the IIRO and DIB, documents detailing the establishment of and/or closing of the account(s), Know-Your-Customer and/or other customer due diligence reports, suspicious activity and/or transaction reports, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

40. Please provide any and all documents relating to DIB accounts established or held in the name of, on behalf of, and / or for the benefit of the Special Chechen Refugees Assistance Fund, including, but not limited to, DIB Account No. 01520483656101. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and / or e-mails, that refer to, relate to, or reflect communications between or among the Special Chechen Refugees Assistance Fund and DIB, documents detailing the establishment of and/or closing of the account(s), Know-Your-Customer and/or other customer due diligence reports, suspicious activity and/or transaction reports, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

41. Please provide any and all documents relating to DIB accounts established or held in the name of, on behalf of, and / or for the benefit of the Dar al Bir, including, but not limited to, DIB Account No. 02520529179802. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and / or e-mails, that refer to, relate to, or reflect communications between or among Dar al Bir and DIB, documents detailing the establishment of and/or closing of the account(s), Know-Your-Customer and / or other customer due diligence reports, suspicious activity and/or transaction reports, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

42. Please provide any and all documents relating to DIB accounts established or held in the name of, on behalf of, and / or for the benefit of the Jamiyat Dubai al Heiriya, including, but not limited to, DIB Account No. 6828566. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and/or e-mails, that refer to, relate to, or reflect communications between or among Jamiyat Dubai al Heiriya and DIB, documents detailing the establishment of and/or closing of the account(s), Know-Your-Customer and/or other customer due diligence reports, suspicious activity and/or transaction reports, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

43. Please provide any and all documents relating to DIB accounts established or held in the name of, on behalf of, and / or for the benefit of the Charitable Society-A-Fajeerah, including, but not limited to, DIB Account No. 06520509045801. Such documents shall include, but are not limited to, correspondence, letters, memoranda, notes, and / or e-mails, that refer to, relate to, or reflect communications between or among Charitable Society-A-Fajeerah and DIB, documents detailing the establishment of and/or closing of the account(s), Know-Your-Customer and/or other customer due diligence reports, suspicious activity and/or transaction reports, monthly account statements, annual account statements, account notices, deposits, withdrawals, deposit slips, check stubs, cleared or canceled checks, cashier checks, money orders, debit/credit memos, financial ledgers, journals, investment records, real estate records, records of assets, loan records, audit work papers, audit reports, wire transfers, and any documentation showing the source(s) and/or destination(s) of any funds deposited into or withdrawn from those accounts.

ANSWER:

Dated: July 31, 2012

Respectfully submitted,

/s/

THE MDL 1570 PLAINTIFFS'
EXECUTIVE COMMITTEES

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the Plaintiffs' Supplemental Requests for Production of Documents Directed to Dubai Islamic Bank was served via electronic mail this 31st day of July 2012, upon:

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(Defendant's Executive Committee's appointed representative in 03 MDL 1570)

/s/ _____
Robert T. Haefele, Esq.